

DOCKETED

Docket Number:	08-AFC-09C
Project Title:	Palmdale Energy Project (Formerly Palmdale Hybrid Power Plant) - Compliance
TN #:	216278
Document Title:	Palmdale Energy LLC's Air Quality Rebuttal Testimony
Description:	N/A
Filer:	Marie Fleming
Organization:	DayZen LLC
Submitter Role:	Applicant Representative
Submission Date:	2/28/2017 10:12:04 AM
Docketed Date:	2/28/2017

STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

Petition For Amendment for the
PALMDALE ENERGY PROJECT

DOCKET NO. 08-AFC-09C

**DECLARATION OF GREGORY
DARVIN**

I, Gregory Darvin, declare as follows:

1. I am presently the owner of Atmospheric Dynamics, Inc.
2. A copy of my professional qualifications and experience was included with my Opening Testimony and is incorporated by reference in this Declaration.
3. I prepared the attached testimony relating to Air Quality for the Petition for Amendment for the Palmdale Energy Project (California Energy Commission Docket Number 08-AFC-09C).
4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.
5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on February 27, 2017.



Gregory Darvin

**PALMDALE ENERGY, LLC
PALMDALE ENERGY PROJECT
AIR QUALITY - REBUTTAL TESTIMONY**

I. Name: Gregory Darvin

II. Purpose:

My rebuttal testimony addresses the subject of Air Quality associated with the construction and operation of the Palmdale Energy Project (PEP) as described in the Petition For Amendment (Petition) (08-AFC-9C).

III. Qualifications:

My qualifications are detailed in my Air Quality Opening Testimony, TN 215189, which was docketed on January 6, 2017.

To the best of my knowledge all referenced documents and all of the facts contained in this testimony are true and correct. To the extent this testimony contains opinions, such opinions are my own. I make these statements and provide these opinions freely and under oath for the purpose of constituting sworn testimony in this proceeding.

IV. Opinion and Conclusions

I have reviewed the Staff's Opening Testimony for Air Quality, TN 216180, docketed on February 22, 2017 and I propose the following changes to Staff's Proposed modified Condition of Certification **AQ-SC6**. **AQ-SC6** incorporates the monitoring and record keeping requirements of the AVAQMD FDOC conditions AQT-17 (Turbines), AQDB-5 (HRSG), AQSCR-6 (SCR), and AQAB-6 (Auxiliary Boiler). My proposed changes include specific reference to those conditions within the body of Staff Proposed Condition of Certification **AQ-SC6**, and are shown in **bold and underline**.

AQ-SC6 The project owner shall submit to the CPM Quarterly Operation Reports, following the end of each calendar quarter that include operational and emissions information as necessary to demonstrate compliance with the Conditions of Certification **AQT-17, AQDB-5, AQSCR-6 and AQAB-6** herein. The Quarterly Operation Report will **shall** specifically state that the facility meets all applicable Conditions of Certification or note or highlight all incidences of noncompliance as required under **AQT-17, AQDB-5, AQSCR-6 and AQAB-6**. **Annual operation reports shall be submitted as part of the fourth Quarterly Report.**